

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WASHINGTON  
AT SEATTLE

JEREMY CONKLIN, D.O., an individual,

**Plaintiff,**

vs.

UNIVERSITY OF WASHINGTON MEDICINE, a Washington public health system; UW MEDICINE/NW, a Washington public benefit corporation; UNIVERSITY OF WASHINGTON MEDICAL CENTER, a Washington public hospital; UNIVERSITY OF WASHINGTON SCHOOL OF MEDICINE, a Washington public educational institution; PAUL RAMSEY, M.D., in his official capacity and individually; LESTER PERMUT, M.D., in his official capacity and individually; SEATTLE CHILDREN'S HOSPITAL, a Washington non-profit corporation; CHILDREN'S UNIVERSITY MEDICAL GROUP, a Washington pediatric group; MARY BRIDGE CHILDREN'S FOUNDATION, a Washington public benefit corporation; AMERICAN BOARD OF THORACIC SURGERY, INC., an Illinois non-profit corporation; THORACIC SURGERY DIRECTORS ASSOCIATION, INC., a North Carolina non-profit corporation; and ACCREDITATION COUNCIL FOR GRADUATE MEDICAL

NO. 2:18-cv-00090-RSL

STIPULATION AND [PROPOSED]  
ORDER OF WITHDRAWAL AND  
SUBSTITUTION OF COUNSEL FOR  
DEFENDANT THORACIC SURGERY  
DIRECTORS ASSOCIATION, INC.

**NOTE ON MOTION CALENDAR:**  
February 22, 2018

STIPULATION AND [PROPOSED]  
ORDER OF WITHDRAWAL AND  
SUBSTITUTION OF COUNSEL (2:18-cv-  
00090-RSL)

**• Betts  
Patterson  
Mines**  
**One Convention Place**  
Suite 1400  
701 Pike Street  
Seattle, Washington 98101-3927  
(206) 292-9988

1 EDUCATION, an Illinois non-profit  
2 corporation,

2 Defendants.

3 Pursuant to LCR 83.2(b)(1), Plaintiff Jeremy Conklin, D.O. and Defendant Thoracic  
4 Surgery Directors Association, Inc. ("TSDA"), through their respective counsel, hereby stipulate  
5 and move the Court for an order allowing the withdrawal and substitution of counsel as outlined  
6 below.

7 **I. STIPULATION**

8 Plaintiff and TSDA stipulate and agree as follows:

9 1. TSDA is currently represented by William F. Cronin and Kristina Markosova of  
10 Corr Cronin Michelson Baumgardner Fogg & Moore LLP. William F. Cronin and Kristina  
11 Markosova request leave to withdraw as counsel for TSDA pursuant to LCR 83.2(b)(1).

12 2. TSDA has retained James D. Nelson, Shaina R. Johnson, and Natalie A. Moore of  
13 Betts, Patterson & Mines, P.S. to represent it in this matter. James D. Nelson, Shaina R.  
14 Johnson, and Natalie A. Moore request that they be substituted as counsel for TSDA pursuant to  
15 LCR 83.2(b)(1).  
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DATED this 22<sup>nd</sup> day of February, 2018.

HKM EMPLOYMENT ATTORNEYS, LLP BETTS, PATTERSON & MINES, P.S.

By/s/Kristi Favard [per email authorization]

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Attorneys for Plaintiff

By/s/James D. Nelson

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Shaina R. Johnson, WSBA #46079  
Natalie A. Moore, WSBA #45333  
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Substituting Attorneys for Defendant  
Thoracic Surgery Directors Association, Inc.

CORR CRONIN MICHELSON  
BAUMGARDNER FOGG & MOORE LLP

By/s/William F. Cronin [per email authorization]

By/s/Kristina Markosova [per email authorization]  
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Withdrawing Attorneys for Defendant  
Thoracic Surgery Directors Association, Inc.

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2                   **II. ORDER**  
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4                   The Court approves the above stipulation and orders as follows:  
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- 6                   1. William F. Cronin and Kristina Markosova of Corr Cronin Michelson  
7 Baumgardner Fogg & Moore LLP are granted leave to withdraw as counsel for Thoracic Surgery  
8 Directors Association, Inc.  
9  
10                  2. James D. Nelson, Shaina R. Johnson, and Natalie A. Moore of Betts, Patterson &  
11 Mines, P.S. are hereby substituted as counsel for Thoracic Surgery Directors Association, Inc.

12                  DATED this 23<sup>rd</sup> day of Feb., 2018

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UNITED STATES DISTRICT JUDGE

Lodged by:

BETTS, PATTERSON & MINES, P.S.

By/s/James D. Nelson

By/s/Shaina R. Johnson

By/s/Natalie A. Moore

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Substituting Attorneys for Defendant Thoracic  
Surgery Directors Association, Inc.

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1 Approved for entry by:

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13 Withdrawing Attorneys for Defendant

14 Thoracic Surgery Directors Association, Inc.

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